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7  
8 **UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

9 United States of America,  
10  
11 Plaintiff,  
12  
13 v.

14 IMANI N. KAUFMAN,  
15 Defendant.

2:24-cr-00177-APG-BNW

**Stipulation to Dismiss Petition**

16 IT IS HEREBY STIPULATED AND AGREED, by and between SUE FAHAMI,  
17 Acting United States Attorney, and Steven Rose, Assistant United States Attorney, counsel  
18 for the United States of America, and Rene L. Valladares, Federal Public Defender, and  
19 Brian Pugh, Assistant Federal Public Defender, counsel for Imani N. Kaufman, to  
20 recommend that the Petition for Revocation of Supervised Release [ECF No. 6] be  
21 dismissed without prejudice.

22 This Stipulation is entered into for the following reasons:

- 23 1. Defendant was previously ordered to reside at the Residential Reentry Center (RRC)
- 24

1 as a condition of her supervised release. Defendant's residence at the RRC was for a  
2 period of up to six months.

3 2. Defendant has substantially completed her six-month residency at the RRC.

4 3. Defendant has made substantial progress during her time at the RRC, in that she has  
5 complied with all of the rules and regulations of the RRC, and has otherwise  
6 complied with the terms and conditions of her supervised release.

7 4. Based upon defendant's conduct at the RRC, and in consultation with her  
8 supervisory officer, the parties believe that dismissal of the petition, without  
9 prejudice, is the appropriate recommendation.

10 5. The parties further believe that such a recommendation is appropriate to preserve  
11 judicial resources, and request vacatur of the March 4, 2025, hearing.

12  
13 Respectfully submitted this 25th day of February 2025.

14 SUE FAHAMI  
15 Acting United States Attorney

16 /s/Steven J. Rose  
STEVEN J. ROSE  
17 Assistant United States Attorney

/s/Brian Pugh  
BRIAN PUGH  
Counsel for Defendant,  
IMANI N. KAUFMAN

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6 **UNITED STATES DISTRICT COURT**  
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8 United States of America,  
9 Plaintiff,

10 v.

11 IMANI N. KAUFMAN,  
12 Defendant.

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**ORDER**

13  
14 IT IS THEREFORE ORDERED that the Petition for Revocation of Supervised  
15 Release as to defendant Imani N. Kaufman's be dismissed without prejudice, and that the  
16 hearing currently scheduled for March 4, 2025, be vacated.

17  
18  
19 DATED this 27th day of February 2025.

20  
21   
22 HONORABLE ANDREW P. GORDON  
23 CHIEF UNITED STATES DISTRICT JUDGE  
24